

DRAFT AIR POLLUTION CONTROL CONSTRUCTION PERMIT

EI FACILITY NO: 408021020

CONSTRUCTION PERMIT NO.: 14-CVC-009

TYPE:

Construction Permit for Processes: P82, P84

In compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: Brillion Iron Works Inc.

Street Address: 200 Park Ave.,
Brillion, Calumet County, Wisconsin

Responsible Official, & Title: Tom Burke, Plant Manager

is authorized to construct and initially operate core production operations described in the plans and specifications dated January 8, 2014; February 3, 2014; February 19, 2014; February 20, 2014; February 25, 2014; March 4, 2014; March 12, 2014; March 19, 2014; and March 21, 2014 in conformity with the conditions herein. The authority to construct, modify, replace and/or reconstruct any process covered in this Construction Permit expires forty-two (42) months from the date of issuance. This approved period to construct, modify, replace and/or reconstruct may be extended for up to 18 months upon request for cause, prior to expiration, unless otherwise specified by this construction permit. The conditions of this construction permit are permanent and may only be revised through a revision of the construction permit or through the issuance of a new construction permit. [s. 285.60(1), Wis. Stats.]

Conditions of the construction permit marked with an asterisk (*) have been created outside of the Wisconsin's federally approved State Implementation Plan (SIP) and are not federally enforceable.

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Madison, Wisconsin

DRAFT

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By DRAFT
Kristin Hart
Chief, Air Permits and Stationary Source
Modeling Section

Part I

W. Stack S59, Process P82: One New Shell Core Machine			
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
1. Volatile Organic Compounds (VOCs)	<p>(1) Usage of shell core sand in the new shell core machine may not exceed 4,000 tons per consecutive 12-month period.¹ [s. 285.65(7), Wis. Stats.; 14-CVC-009]</p> <p>(2) The binder content of the shell core sand may not exceed 2.0%. [s. 285.65(7), Wis. Stats.; 14-CVC-009]</p>	<p>(1) The permittee shall keep the records required in Condition W.1.c.(2). [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(2) The permittee shall keep on file the manufacturer and serial number of the new shell core machine. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(3) Upon commencing construction of the new shell core machine, the permittee shall permanently discontinue operation of the existing shell core machine which it replaces, and shall either remove that existing shell core machine or make it permanently inoperable. [s. NR 406.10, Wis. Adm. Code; ss. 285.65(3) and (7), Wis. Stats.; 14-CVC-009]</p>	<p>(1) Reference Test Method for Volatile Organic Compound Emission Rates: Whenever emission testing of volatile organic compound (VOC) emission concentrations or emission rates is required, the permittee shall use U.S. EPA Method 25A, or alternative methods approved by the Department in writing. [s. NR 439.06(3)(a), Wis. Adm. Code; 14-CVC-009]</p> <p>(2) The permittee shall:</p> <p>(a) Maintain monthly records of the amount of shell core sand used in the new shell core machine, in tons; and</p> <p>(b) Within 30 days after the end of each month, calculate and record the amount of shell core sand used in the new shell core machine during the previous consecutive 12-month period, in tons. [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]</p> <p>(3) The permittee shall maintain copies of certified product data sheets or safety data sheets that list the binder content of the shell core sand. [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]</p>
2. *Ammonia and *Formaldehyde	(1) *Emissions of ammonia and formaldehyde are EXEMPT from the requirements of s. NR 445.07(1)(c), provided that the permittee demonstrates that it is in compliance with applicable Occupational Safety and Health Administration requirements. ² [ss. *NR 445.07(5)(d)1. and 2., Wis. Adm. Code; 14-CVC-009]	(1) * The permittee shall keep the records required in Condition W.2.c.(2). [s. NR *445.07(5)(d)2.c., Wis. Adm. Code; 14-CVC-009]	<p>(1)*Whenever ammonia or formaldehyde exposure testing is required, the permittee shall use the appropriate OSHA test method [s. *NR 439.06(8), Wis. Adm. Code; 14-CVC-009]</p> <p>(2) *The permittee shall keep records of OSHA exposure testing for ammonia and formaldehyde that was conducted in the shell core production areas in Plants 1 and 2. [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]</p>

¹ This limit is needed so that the project will be a minor modification under PSD.

² Ammonia and formaldehyde emissions from Process P82 are indoor fugitive emissions.

X. Stacks S56 and S61, Control Devices C33, C34, C36 and C39, Process P84: Eleven Isocure Core Machines.			
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
1. Volatile Organic Compound (VOC) Emissions	<p>(1) Latest Available Control Techniques (LACT): LACT has been determined to be:</p> <p>(a) Use of acid scrubbers C33, C34, C36 and C39 to control emissions of the amine catalyst emissions from the amine gassing step; and</p> <p>(b) The use of low-emitting binder chemicals. [s. NR 424.03(2)(c), Wis. Adm. Code; 14-CVC-009]</p> <p>(2) After an Isocure core machine is modified by replacing the amine catalyst gas generator, usage of binder in the modified Isocure core machine may not exceed the following amounts:³</p> <p>(a) Machine #1: 100,000 pounds per consecutive 12-month period.</p> <p>(b) Machine #2: 100,000 pounds per consecutive 12-month period.</p> <p>(c) Machine #3: 100,000 pounds per consecutive 12-month period.</p> <p>(d) Machine #4: 100,000 pounds per consecutive 12-month period.</p> <p>(e) Machine #5: 165,000 pounds per consecutive 12-month period.⁴</p> <p>(f) Machine #6: 165,000 pounds per consecutive 12-month period.</p> <p>(g) Machine #7: 100,000 pounds per consecutive 12-month period.</p> <p>(h) Machine #8: 100,000 pounds per consecutive 12-month period.</p> <p>(i) Machine #9: 165,000 pounds per consecutive 12-month period.</p> <p>(j) Machine #10: 165,000 pounds per consecutive 12-month period.</p> <p>(k) Machine #11: 165,000 pounds per consecutive 12-month period. [s. 285.65(7), Wis. Stats.; 14-CVC-009]</p>	<p>(1) Each acid scrubber C33, C34, C36 and C39 shall be in operation at all times that one or more of the Isocure core machines it controls is in operation. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(2) The pH of the scrubber water in each acid scrubber shall be 5 or less. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(3) The water recirculation rate in each acid scrubber shall be maintained at or above the following values:</p> <p>(a) C33: 45 gallons per minute.</p> <p>(b) C34: 45 gallons per minute.</p> <p>(c) C36: 58 gallons per minute.</p> <p>(d) C39: 72 gallons per minute. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(4)(a) The permittee shall install, calibrate, maintain and operate pH monitoring devices capable of measuring and recording the pH of the scrubber water used in each acid scrubber.</p> <p>(b) The permittee shall install, calibrate, maintain and operate a device to measure the water recirculation flow rate in each acid scrubber.</p> <p>(c) The permittee shall install, calibrate, maintain and operate a device to measure the pressure drop across each acid scrubber. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(5) The permittee shall conduct monthly inspections and maintenance of the following for each acid scrubber:</p> <p>(a) Scrubber pumps and motors.</p> <p>(b) Pressure drop gauges.</p> <p>(c) pH monitoring device(s).</p> <p>(d) Water flow meters.</p>	<p>(1) Reference Test Method for Volatile Organic Compound Emission Rates: Whenever emission testing of volatile organic compound (VOC) emission concentrations or emission rates is required, the permittee shall use U.S. EPA Method 18, 25, 25A or 25B, as approved by the Department; or alternative methods approved by the Department in writing. [s. NR 439.06(3)(a), Wis. Adm. Code; 14-CVC-009]</p> <p>(2) The permittee shall measure and record the following parameters for each acid scrubber once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements:</p> <p>(a) the pH of the scrubber water;</p> <p>(b) the water recirculation flow rate to the acid scrubber; and</p> <p>(c) the pressure drop across the acid scrubber. [s. NR 439.055(2)(b), Wis. Adm. Code; 14-CVC-009]</p> <p>(3) The permittee shall keep records of the dates of all inspections and maintenance performed on Control Devices C33, C34, C36 and C39, the items inspected or maintained, and the initials of the person performing the inspections or maintenance. [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]</p> <p>(4) The permittee shall:</p> <p>(a) Maintain monthly records of the amount of binder used in each Isocure core machine, in pounds;</p> <p>(b) Maintain monthly records of the amount of catalyst used in each Isocure core machine, in</p>

³ The limits in Conditions X.1.a.(2), (3), (4), (5) and (6) are needed so that the project will be a minor modification under PSD.

⁴ Machine #5 is the L40 Laempe core machine.

X. Stacks S56 and S61, Control Devices C33, C34, C36 and C39, Process P84: Eleven Isocure Core Machines.			
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
1. Volatile Organic Compound (VOC) Emissions – Continued	<p>(3) After an Isocure core machine is modified by replacing the amine catalyst gas generator, usage of catalyst in the modified Isocure core machine may not exceed the following amounts:</p> <p>(a) Machine #1: 777 gallons per consecutive 12-month period.</p> <p>(b) Machine #2: 777 gallons per consecutive 12-month period.</p> <p>(c) Machine #3: 777 gallons per consecutive 12-month period.</p> <p>(d) Machine #4: 777 gallons per consecutive 12-month period.</p> <p>(e) Machine #5: 1282 gallons per consecutive 12-month period.</p> <p>(f) Machine #6: 1282 gallons per consecutive 12-month period.</p> <p>(g) Machine #7: 777 gallons per consecutive 12-month period.</p> <p>(h) Machine #8: 777 gallons per consecutive 12-month period.</p> <p>(i) Machine #9: 1282 gallons per consecutive 12-month period.</p> <p>(j) Machine #10: 1282 gallons per consecutive 12-month period.</p> <p>(k) Machine #11: 1282 gallons per consecutive 12-month period</p> <p>[s. 285.65(7), Wis. Stats.; 14-CVC-009]</p> <p>(4) Usage of binder in each new Isocure core machine may not exceed the following amounts:</p> <p>(a) Machine #1: 165,000 pounds per consecutive 12-month period.</p> <p>(b) Machine #2: 165,000 pounds per consecutive 12-month period.</p> <p>(c) Machine #3: 165,000 pounds per consecutive 12-month period.</p> <p>(d) Machine #4: 165,000 pounds per consecutive 12-month period.</p> <p>(e) Machine #7: 165,000 pounds per consecutive</p>	<p>[s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(6) The permittee shall conduct monthly inspections of each Isocure core machine to confirm that the catalyst capture system is intact and operational per the manufacturer's design recommendations. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(7) The permittee shall keep the records required in Conditions X.1.c.(4), (5), (6) and (7). [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(8) Upon installation of each new Isocure core machine, the permittee shall permanently discontinue operation and remove or make permanently inoperable the existing Isocure core machine which it replaces. [s. NR 406.10, Wis. Adm. Code; ss. 285.65(3) and (7), Wis. Stats.; 14-CVC-009]</p>	<p>gallons;</p> <p>(c) Within 30 days after the end of each month, calculate and record the amount of binder used in each Isocure core machine during the previous consecutive 12-month period, in pounds; and</p> <p>(d) Within 30 days after the end of each month, calculate and record the amount of catalyst used in each Isocure core machine during the previous consecutive 12-month period, in gallons. [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]</p> <p>(5) The permittee shall keep records of the results of all VOC removal testing conducted on control devices C33, C34, C36 and C39. [s. NR 439.04(1)(a), Wis. Adm. Code; 14-CVC-009]</p> <p>(6) The permittee shall keep records of the results of Ohio Cast Metals Association 12-hour VOC emissions testing conducted on the Isocure binder system used in Process P84. [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]</p> <p>(7) The permittee shall keep the following records:</p> <p>(a) The machine number (#1, #2, #3 etc.), manufacturer and serial number of each new or modified Isocure core machine.</p> <p>(b) For each new Isocure core machine, the manufacturer and serial number of the Isocure core machine it replaces.</p> <p>(c) For each new or modified Isocure core machine, the acid scrubber (C33, C34, C36 or C39) which it is ducted to. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p>

X. Stacks S56 and S61, Control Devices C33, C34, C36 and C39, Process P84: Eleven Isocure Core Machines.			
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
1. Volatile Organic Compound (VOC) Emissions – Continued	<p>12-month period. (f) Machine #8: 165,000 pounds per consecutive 12-month period. [s. 285.65(7), Wis. Stats.; 14-CVC-009]</p> <p>(5) Usage of catalyst in each new Isocure core machine may not exceed the following amounts: (a) Machine #1: 1282 gallons per consecutive 12-month period. (c) Machine #2: 1282 gallons per consecutive 12-month period. (a) Machine #3: 1282 gallons per consecutive 12-month period. (c) Machine #4: 1282 gallons per consecutive 12-month period. (a) Machine #7: 1282 gallons per consecutive 12-month period. (c) Machine #8: 1282 gallons per consecutive 12-month period. [s. 285.65(7), Wis. Stats.; 14-CVC-009]</p> <p>(6) Each acid scrubber C33, C34, C36 and C39 shall have a VOC removal efficiency of at least 99%. [ss. 285.65(3) and (7), Wis. Stats.; 14-CVC-009]</p> <p>(7) Ecolotec binders may be used in place of Isocure binders in any Isocure core machine. [ss. 285.65(3) and (7), Wis. Stats.; 14-CVC-009]</p> <p>(8) The permittee may use dimethylethylamine (DMEA), dimethylisopropylamine (DMIPA) or dimethylpropylamine (DMPA) as a catalyst gas in the Isocure core making process. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p>		

X. Stacks S56 and S61, Control Devices C33, C34, C36 and C39, Process P84: Eleven Isocure Core Machines.			
POLLUTANT	a. LIMITATIONS	b. COMPLIANCE DEMONSTRATION	c. REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
2. *Formaldehyde Emissions	(1) *Emissions of formaldehyde are EXEMPT from the requirements of s. NR 445.07(1)(c), provided that the permittee demonstrates that it is in compliance with applicable Occupational Safety and Health Administration requirements. ⁵ [s. *NR 445.07(5)(d)2., Wis. Adm. Code; 14-CVC-009]	(1) * The permittee shall keep the records required in Condition X.2.c.(2). [s. NR *445.07(5)(d)2.c., Wis. Adm. Code; 14-CVC-009]	(1)*Whenever formaldehyde exposure testing is required, the permittee shall use the appropriate OSHA test method [s. *NR 439.06(8), Wis. Adm. Code; 14-CVC-009] (2) *The permittee shall keep records of OSHA exposure testing for formaldehyde that was conducted in the Isocure core production areas in Plants 1 and 2. [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]

⁵ Formaldehyde emissions from Process P84 are indoor fugitive emissions.

ZZZ. Conditions Applicable to the Entire Facility⁶		
CONDITION TYPE	a. CONDITIONS	b. COMPLIANCE DEMONSTRATION REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
1. Alternate Operating Scenario: Use of raw materials not included in the permit application	<p>(1) If the permittee has the capability to burn or use a raw material not included in the application reviewed for this permit, the permittee may use this material without first obtaining a construction permit provided the following conditions are met:</p> <p>(a) The source has continuously had such design capability to burn or use the raw material.</p> <p>(b) The use will not cause or exacerbate the violation of an ambient air quality standard or an ambient air increment.</p> <p>(c) The use is not prohibited by any permit, plan approval or special order applicable to the source.</p> <p>(d) The use will not result in a violation of any emission limit in chs. NR 405, 408, 409, 415 to 436, and 445, Wis. Adm. Code.</p> <p>(e) The use will not subject the source to any standard or regulation under s. 112 of the Clean Air Act (42 USC 7412). [s. NR 406.04(4)(a), Wis. Adm. Code]</p>	<p>(1) Any calculations and supporting material required to demonstrate compliance with Condition ZZZ.1.a.(1) shall be kept on file by the permittee. [ss. NR 407.09(1)(c)2. and NR 439.04(1)(d), Wis. Adm. Code]</p>

⁶ Table ZZZ in this construction permit #14-CVC-009 includes only those sections with conditions that come from the construction permit, or that are referenced by other conditions in the construction permit. Hence, the numbering is not sequential.

ZZZ. Conditions Applicable to the Entire Facility⁶		
CONDITION TYPE	a. CONDITIONS	b. COMPLIANCE DEMONSTRATION REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
2. Emissions Testing	<p>(1) At times specified in this permit, or when requested by the Department, the permittee shall perform emissions testing. [s. NR 439.075(1)(b), Wis. Adm. Code]</p> <p>(2) If any required compliance emission test(s) cannot be conducted within the time frames specified in this permit, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s). [s. NR 439.07, Wis. Adm. Code]</p> <p>(3) All testing shall be performed with the emissions unit operating at capacity or as close to capacity as practicable and in accordance with approved procedures. If operation at capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(4) The Department shall be informed at least 20 working days prior to any stack testing, so a Department representative can witness the testing. At the time of notification, a compliance emission test plan shall also be submitted to the Department for approval. When approved in writing, an equivalent test method may be substituted for the reference test method. The notification and test plan shall be submitted to the Wisconsin Department of Natural Resources, Northeast Region Headquarters. [s. NR 439.07(2), Wis. Adm. Code]</p>	<p>(1) Whenever emissions testing is required:</p> <p>(a) All testing shall be performed while the emissions unit is operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(b) The Department shall be informed at least 20 working days prior to any stack testing so a Department representative can witness the testing. At the time of notification an emissions test plan shall also be submitted to the Department for approval. When approved in writing, an equivalent test method may be substituted for the reference test method specified in this permit. [s. NR 439.07(2), Wis. Adm. Code]</p> <p>(c) Two copies of the report on the tests shall be submitted to the Department for evaluation within 60 days following the tests. [s. NR 439.07(9), Wis. Adm. Code]</p>

ZZZ. Conditions Applicable to the Entire Facility⁶		
CONDITION TYPE	a. CONDITIONS	b. COMPLIANCE DEMONSTRATION REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
3. *State Hazardous Air Pollutants (State HAPs)	(1) *No owner or operator of a source may cause, allow or permit emissions of a hazardous air contaminant listed in Table A of s. NR 445.07, Wis. Adm. Code, in such quantity or concentration or for such duration as to cause an ambient air concentration of the contaminant off the source property that exceeds the concentration in column (g) of Table A for the contaminant. [s. NR *445.07(1)(a), Wis. Adm. Code; 14-CVC-009]	<p>(1) *The permittee shall only burn Group 1 virgin fossil fuels (Natural gas, propane, distillate #2 and diesel fuel oil) when firing any fuel combustion sources. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(2) *When the permittee elects to significantly change the existing operation (e.g., raw material or product change or production capacity increase), the permittee shall determine, either analytically or through the use of technical calculations, the facility's new or increased potential emissions of any state hazardous air pollutant (State HAP) emitted, assuming maximum operation conditions. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(3) *The permittee shall determine if the facility's new or increased potential emission rate of any State HAP exceeds the applicable published de minimus value in Table A of s. NR 445.07, Wis. Adm. Code. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(4) *When the facility's new or increased potential emission rate of any State HAP exceeds a published de minimus value, the permittee shall evaluate the impact of the pollutant's emission and determine if any additional action needs to be taken to protect the ambient air quality standard. [s. 285.65(3), Wis. Stats.; 14-CVC-009]</p> <p>(5) *Whenever any hazardous air pollutant concentration or emission rate testing of any material is required for demonstrating compliance, the permittee shall use a test method and testing protocol approved by either the US EPA or the Department. [s. 285.65(3), Wis. Stats.; NR 439.06(8), Wis. Adm. Code; 14-CVC-009]</p>

ZZZ. Conditions Applicable to the Entire Facility⁶		
CONDITION TYPE	a. CONDITIONS	b. COMPLIANCE DEMONSTRATION REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
4. Malfunction Prevention and Abatement Plan	(1) The permittee shall prepare and keep on file a Malfunction Prevention and Abatement Plan to prevent, detect and correct malfunctions or equipment failures which may cause any applicable emission limitation to be violated or which may cause air pollution. [ss. NR 407.09(4)(a)3. and 439.11(1), Wis. Adm. Code]	<p>(1) The Malfunction Prevention and Abatement Plan shall include:</p> <p>(a) Identification of the individual responsible for inspecting, maintaining and repairing the air pollution control equipment.</p> <p>(b) The maximum intervals for inspection and routine maintenance of the air pollution control equipment. The maximum interval for routine inspection and maintenance may not exceed that recommended by the manufacturer unless otherwise specified in the Malfunction Prevention and Abatement Plan.</p> <p>(c) A description of the items or conditions that will be checked.</p> <p>(d) A listing of materials and spare parts that will be maintained in inventory.</p> <p>(e) A description of the corrective procedures that will be taken in the event of a malfunction or failure which results in the exceedance of the applicable emission limitation. These corrective procedures shall achieve and maintain compliance with the applicable emission limitations as expeditiously as possible but not longer than the time necessary to discontinue operation of the source consistent with safe operating procedures.</p> <p>(f) A description of the activities and maximum intervals for routine maintenance and inspection of instrumentation installed and operated to monitor the operation of air pollution control equipment as required under s. NR 439.055(1), Wis. Adm. Code. The maximum interval for inspection and routine maintenance may not exceed that recommended by the manufacturer of the instrumentation unless otherwise specified in the Malfunction Prevention and Abatement Plan.</p> <p>(g) The calibration schedule for any device which monitors either a source or air pollution control equipment operational variables. The time between calibrations may not exceed one year or as specified in the Malfunction Prevention and Abatement Plan, whichever is shorter.</p> <p>(h) Such other information as the department may deem pertinent. [ss. NR 407.09(4)(a)3. and 439.11(1), Wis. Adm. Code]</p> <p>(2) The Malfunction Prevention and Abatement Plan shall be updated once every five years. [ss. NR 407.09(4)(a)3. and 439.11(1), Wis. Adm. Code]</p>

ZZZ. Conditions Applicable to the Entire Facility⁶		
CONDITION TYPE	a. CONDITIONS	b. COMPLIANCE DEMONSTRATION REFERENCE TEST METHODS, RECORDKEEPING AND MONITORING REQUIREMENTS
8. Compliance Reports	<p>(1) Except as provided under ZZZ.9.a.(9), the permittee shall submit periodic monitoring reports. [s. NR 407.09(1)(c)3., Wis. Adm. Code; 14-CVC-009]</p> <p>(2) Except as provided under ZZZ.9.a.(9), the permittee shall submit periodic certification of compliance. [s. NR 407.09(4)(a)3., Wis. Adm. Code; 14-CVC-009]</p>	<p>(1) Submit to the Northeast Region Air Management Program, 2984 Shawano Avenue, Green Bay, WI 54313-6727, phone (920)662-5158, a report detailing the results of the recordkeeping and/or monitoring required to demonstrate compliance, as described in section D. of Part II of this permit. This report shall be submitted by March 1, for the previous July 1 through December 31, and by September 1, for the previous January 1 through June 30, for each year the operation permit is in effect. [s. NR 439.03(1)(b) and (2), Wis. Adm. Code; 14-CVC-009]</p> <p>(2) Submit certification of compliance with state and federal air regulations to the Northeast Region Air Management Program, 2984 Shawano Avenue, Green Bay, WI 54313-6727, phone (920)662-5158, and to U.S. EPA at Compliance Data-Wisconsin, Air and Radiation Division, U.S. EPA, 77 W. Jackson, Chicago, IL 60604, by March 1, for the period from January 1 to December 31 of the previous year, of each year the operation permit is in effect. The content of the submittal is described in section N. of Part II of this permit. [s. NR 439.03(1)(c), Wis. Adm. Code; 14-CVC-009]</p>

ZZZ. Conditions Applicable to the Entire Facility	
CONDITION TYPE	a. CONDITIONS
9. Construction Permit 14-CVC-009 Transitional Language	<p>(1) Notifications - General.</p> <p>(a) The permittee shall inform the Department of the date construction commences on any new or modified emission units addressed in Permit 14-CVC-009.</p> <p>(b) For the new shell core machine, “operational” shall be defined as the first time any process related air contaminant is emitted into the ambient air after installation of the new shell core machine.</p> <p>(c) For a modified Isocure core machine, “operational” shall be defined as the first time any process related air contaminant is emitted into the ambient air after replacement of the amine catalyst gas generator.</p> <p>(b) For a new Isocure core machine, “operational” shall be defined as the first time any process related air contaminant is emitted into the ambient air after installation of the new machine.</p> <p>[s. NR 439.03(1), Wis. Adm. Code; 14-CVC-009]</p> <p>(2) Notifications – Process P82. The permittee shall inform the Department of the following dates within 15 days of the date of the event:</p> <p>(a) The date the existing machine to be replaced by the new machine in Process P82 is shut down.</p> <p>(b) The date the new machine in Process P82 becomes operational.</p> <p>[s. NR 439.03(1), Wis. Adm. Code; 14-CVC-009]</p> <p>(3) Notifications – Process P84. The permittee shall inform the Department of the following dates within 15 days of the date of the event:</p> <p>(a) The date each existing Isocure Core Machine #1, #2, #3, #4, #5, #6, #7, #8, #9, #10, or #11 becomes operational after modification.</p> <p>(b) The date each existing Isocure Core Machine #1, #2, #3, #4, #7 or #8 is shut down.</p> <p>(c) The date each new Machine #1, #2, #3, #4, #7 or #8 becomes operational.</p> <p>[s. NR 439.03(1), Wis. Adm. Code; 14-CVC-009]</p> <p>(4) Construction Authorization Expiration.</p> <p>(a) Except as specified in (b) and (c) below, the Authorization to Construct, under Construction Permit 14-CVC-009 expires 42 months after the date of issuance. Construction or modification and an initial operation period for equipment shakedown, testing and Department evaluation of operation to assure conformity with the permit conditions is authorized for each emissions unit covered in this permit. Please note that the sources covered by this permit are required to meet all emission limits and conditions contained in the permit at all times, including during the initial operation period. If 42 months is an insufficient time period for construction or modification, equipment shakedown, testing and Department evaluation of operation, the permit holder may request and the Department may approve in writing an extension of this permit. The conditions of the construction permit are permanent, unless revised, superseded or revoked.</p> <p>(b) Modification of any existing Isocure core machine, and construction of any new Isocure core machine, covered under this Construction Permit 14-CVC-009 must commence prior to December 31, 2017.</p> <p>(c) Construction of the new shell core machine in Process P82 must commence prior to December 31, 2017.</p> <p>[ss. 285.60(1)(a)2., 285.65(3) and 285.66(1), Wis. Stats.; s. NR 406.12, Wis. Adm. Code; 14-CVC-009]</p>

ZZZ. Conditions Applicable to the Entire Facility	
CONDITION TYPE	a. CONDITIONS
9. Construction Permit 14-CVC-009 Transitional Language (Continued)	<p>(5) New or Modified Emission Units: Process P84, Machines #1, #2, #3, #4, #5, #6, #7, #8, #9, #10 and #11. Process P82, new shell core machine. (a) The permittee shall operate each existing Isocure core machine #1, #2, #3, #4 and #5 in Process P79, Plant 1 under the conditions in Table AA of the current operation permit 408021020-P01 (or the corresponding Table for Process P79 in operation permit renewal 408021020-P10, after said renewal is issued) until the unit is modified and operational, or until the unit is replaced with a new Isocure core machine, whichever comes first. Once modified and operational or replaced with a new machine, new or modified Isocure core machines #1, #2, #3, #4 and #5 shall comply with the revised conditions in Table X of construction permit 14-CVC-009. The date of transition shall be the earlier of the date the modified unit becomes operational, or the date that the new unit becomes operational, as defined in Condition ZZZ.9.a.(1). (b) The permittee shall operate each existing Isocure core machine #6, #7, #8, #9, #10 and #11 in Process P84, Plant 2 under the conditions in Table FF of the current operation permit 408021020-P01 (or the corresponding Table for Process P84 in operation permit renewal 408021020-P10, after said renewal is issued) until the unit is modified and operational, or until the unit is replaced with a new Isocure core machine, whichever comes first. Once modified and operational or replaced with a new machine, Isocure core machines #6, #7, #8, #9, #10 and #11 shall comply with the revised conditions in Table X of construction permit 14-CVC-009. The date of transition shall be the earlier of the date the modified unit becomes operational, or the date that the new unit becomes operational, as defined in Condition ZZZ.9.a.(1). (c) Once constructed and initially operating, the new shell core machine in Process P82 shall operate under the conditions in Table W of construction permit 14-CVC-009. [s. NR 439.03(1), Wis. Adm. Code; 14-CVC-009]</p> <p>(6) Malfunction Prevention and Abatement Plan. The permittee shall update the facility's Malfunction Prevention and Abatement Plan to include the operation and maintenance of the control equipment associated with the new or modified emission units in Process P84 within 60 days of the date the first new or modified emission unit becomes operational. [s. NR 439.11, Wis. Adm. Code; 14-CVC-009]</p> <p>(7) Compliance Reports/Records. The permittee shall submit periodic monitoring reports and certification of compliance as required by Conditions ZZZ.8.a.(1) and (2) for any modified and new emission unit for the period when that unit becomes operational. Note that compliance monitoring and reporting requirements and limitations of any unmodified units remain in effect. [s. NR 439.03(1), Wis. Adm. Code; 14-CVC-009]</p>

ZZZ. Conditions Applicable to the Entire Facility	
CONDITION TYPE	a. CONDITIONS
9. Construction Permit 14-CVC-009 Transitional Language (Continued)	<p>(8) Emissions Testing</p> <p>(a) The permittee shall conduct a test of the VOC removal efficiency for Control Device C33 within 180 days of the date that the first new or modified Isocure core machine exhausting to C33 becomes operational.</p> <p>(b) The permittee shall conduct a test of the VOC removal efficiency for Control Device C34 within 180 days of the date that the first new or modified Isocure core machine exhausting to C34 becomes operational.</p> <p>(c) The permittee shall conduct a test of the VOC removal efficiency for Control Device C36 within 180 days of the date that the first new or modified Isocure core machine exhausting to C36 becomes operational.</p> <p>(d) The permittee shall conduct a test of the VOC removal efficiency for Control Device C39 within 180 days of the date that the first new or modified Isocure core machine exhausting to C39 becomes operational.</p> <p>(e) During testing, the permittee shall monitor and record the pH of the scrubber water, the scrubber water recirculation rate, and the pressure drop across each acid scrubber during each test run.</p> <p>(f) During testing for each control device, the permittee shall verify that the air flow from each core machine that is in operation and ducted to that control device meets the manufacturer's design recommendation.</p> <p>(g) Upon submittal of test results for each control device, the permittee shall submit a recommended pressure drop range for the control device based on the results of the testing.</p> <p>(h) If testing shows that a different minimum pH or water recirculation rate from those listed in Conditions X.1.b.(2) or (3) is needed to achieve 99% removal efficiency, the permittee shall submit recommended ranges for that parameter.</p> <p>(i) These compliance tests shall meet the requirements of ch. NR 439, Wis. Adm. Code for VOC testing, the respective EPA test method(s), and the stack testing requirements in Section ZZZ.2.</p> <p>[ss. NR 439.03 and NR 439.06, Wis. Adm. Code; 14-CVC-009]</p> <p>(11) Completion of Operation Permit Application, Submittal of Compliance Testing Information and other Updates.</p> <p>(a) The permittee shall submit to the Department any updates of the permit application. Updates are required if any changes occur which are not specified or described in the plans and specifications dated January 8, 2014; February 3, 2014; February 19, 2014; February 20, 2014; February 25, 2014; March 4, 2014; March 12, 2014; March 19, 2014; and March 21, 2014. The updates shall be made within 60 days of the date of the change.</p> <p>(b) Other information to be submitted shall include the following:</p> <ul style="list-style-type: none"> (i) Notification requirements in Conditions ZZZ.9.a.(1) through (3). (ii) Records of OSHA exposure testing required by Conditions W.2.c.(2) and X.2.c.(2). (iii) Results of stack testing required by Condition ZZZ.9.a.(10). (iv) Recommended pressure drop ranges for Control Devices C33, C34, C36 and C39. (v) Air flow verifications required by Condition ZZZ.9.a.(8)(f). (vi) Recommended pH and water recirculation rate parameters for Control Devices C33, C34, C36 and C39 if required by Condition ZZZ.9.a.(10)(h). <p>The continued operation of the modified and new emission units addressed in this construction permit are prohibited once the authorization to construct expires per Condition ZZZ.9.a.(6), unless any required updates have been submitted and the permittee has satisfied the notification requirements of Conditions ZZZ.9.a.(1) through (3).</p> <p>[s. NR 439.04(1)(d), Wis. Adm. Code (Permit 14-CVC-009)]</p> <p>(11) Submittals. All submittals described in this permit shall be made in writing and include the name of the facility, the facility's address, the construction permit number and a description of the affected emission units. [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]</p>

ZZZ. Conditions Applicable to the Entire Facility	
CONDITION TYPE	a. CONDITIONS
10. Shutdown of Moldblower II Processes P60 and P63	(1) The permittee shall maintain records showing that Moldblower II Processes P60 and P63 have been permanently shut down or rendered permanently inoperable. Such records may consist of photographs, work orders, invoices for equipment removal or sale, or other records acceptable to the Department. ⁷ [s. NR 439.04(1)(d), Wis. Adm. Code; 14-CVC-009]

⁷ The netting analysis for this construction permit showed that the project is not subject to PSD review, because the net emissions increase of VOCs is less than 40 tons per year. This netting analysis relied on the shutdown of the Moldblower II Processes P60 and P63, which occurred in December of 2012.